REMARKS

Applicants appreciate the Examiner's thorough review of the present application, and respectfully request reconsideration in light of the following remarks. In this submission, claim 3 is amended to correct a typo. Claims 1-4 and 29-32 remain pending in this application. The amendment contains no new matter nor raises any new issues for consideration.

Rejection of claims 1, 2 and 29 under 35 USC § 103(a)

With respect to paragraph 5 of the Office Action, claims 1, 2, and 29 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Nicholson et al. (USPN: 6,150,996) in view of Ludtke et al. (USPN: 6,501,441).

Of the rejected claims, only claims 1 and 29 are independent claims.

When applying 35 U.S.C. §103, the following tenets of patent law must be adhered to:

(A) The claimed invention must be **considered as a whole**;

(B) The references must be considered as a whole and must **suggest the desirability** and thus the obviousness of making the combination;

(C) The references must be **viewed without the benefit of impermissible hindsight vision afforded by the claimed invention** and

(D) **Reasonable expectation of success** is the standard with which obviousness is determined.

Hodosh v. Block Drug Co., Inc., 786 F.2d 1136, 1143 n.5, 229 USPQ 182, 187 n.5 (Fed. Cir. 1986). (MPEP §2141). In addition, if the proposed modification would render the

prior art invention being modified **unsatisfactory for its intended purpose**, then there

is **no suggestion or motivation** to make the proposed modification. *In re Gordon,* 733

F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984) (MPEP 2143)

　　　　As explicitly recited in claim 1, the claimed invention is directed to an image

display system comprising a host for executing an application and a display connected

to the host, wherein **the host comprises a pre-processor for packetizing image data**

of the application, and the display includes a panel control processor for processing

packetized image data transferred from the host and a panel memory for storing

processed image data, and the packetized image data comprises **a header identifying**

the panel control processor and a body including the image data. As explicitly recited

in claim 29 of the claimed invention, the image data comprises **a header identifying a**

first panel control processor from among the plurality of panel control

processors.

　　　　As correctly noted in page 4 of the Office Action, Nicholson et al. is silent about

the packet of information having a specific header that identifies the panel control

processor. The Examiner, however, alleged that the above-identified feature is

disclosed by Ludtke et al. Ludtke teaches a master device 22 sending a configuration

command to inform the display device which image section it is responsible for.

However, Ludtke **is silent on** whether the configuration command might be used to

identify a specific CPU 106 of the display device. After reviewing the descriptions set

forth in col. 19, lines 37-42 of Ludtke, Applicants conclude that the purpose of the

configuration command taught by Ludtke is to initiate the presentation of the video

stream on the multiple display configuration, instead of identifying the CPU 106 as

expressly claimed in the pending claims. For at least this reason, the rejection should be withdrawn.

The Office Action further cites col. 4, lines 15-35 of the Ludtke reference to support the assertion in this rejection. However, the address value of the data packet taught by Ludtke, which corresponds to a memory location within the appropriate display device, **is not** "a header identifying a panel processor" as presently claimed.

All display devices of the claimed embodiments may receive image data, but only those display devices having the panel control processor identified in the header would display the image data. In contrast, the image data stream for each display device taught by Ludtke is transmitted over a separate isochronous channel (col. 4, lines 12-13 of the Ludtke reference). Therefore, Ludtke teaches using "different channels" to dictate which display device receives the image data being transferred, instead of "the header with panel processor identifying function" as presently claimed.

In page 2, the Office Action cited Ludtke col. 19 lines 49-52, alleging that "…it should also be apparent that **multiple master devices** could be utilizes to configure and control display devices within a multiple display configuration…", so as to conclude that it is obvious to a person of ordinary skill in the art to include in **the header information about identifying a particular panel processor**; and also alleged that it is obvious to a person of ordinary skill in the art to do so as processing burden is distributed to multiple master devices. It is not clear if the Office Action is intending to relate Ludtke's master devices to the host of the claimed embodiments (or Nicholson's sign controller 18) or to the panel control processors of the claimed embodiments (or Nicholson's microprocessors 62). However, as described in Ludtke col. 19 lines 28-33

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and lines 42-47, the step of partitioning the image data is performed by the master devices 22 or the display devices. Therefore, assuming (for the sake of argument) that the teachings of Nicholson and Ludtke could be combined and Ludtke's master devices were corresponding to the host of the claimed embodiments (or Nicholson's sign controller 18), the resulting device would disclose **a plurality of hosts** capable of partitioning the image data. In contrast, the claimed embodiments basically define **a singel host**. On the other hand, assuming (again for the sake of argument) that the teachings of Nicholson and Ludtke could be combined and Ludtke's master devices were corresponding to the panel control processors of the claimed embodiments (or Nicholson's microprocessors 62), the resulting device would merely disclose **a plurality of panel control processors capable of partitioning the image data**. In contrast, the panel control processors of the claimed embodiments do not perform the step of partitioning the image data. Accordingly, Nicholson in view Ludtke (even if properly combined) do not teach or suggest the claimed embodiments, with respect to structure and functions. For at least this additional reason, the rejections should be withdrawn.

Moreover, the Office Action has held the position that a person of ordinary skill in the art can learn from Ludtke col. 19 lines 49-52 to include in the header information about identifying a particular panel processor, as this would allegedly improve efficiency of the processing system. It is not clear that how the Office Action reaches this conclusion. Simply stated, neither Nicholson nor Ludtke suggests the **desirability** of improving efficiency of the processing system and providing the header information about identifying a particular panel processor. Therefore, it appears that that the

teachings of Nicholson and Ludtke were viewed from the improper perspective of hindsight.

Claims 1 and 29 are reproduced below with emphasis on features that clearly define over Nicholson and Ludtke.

> 1. An image display system comprising:
> *a host for executing an application, the host comprising a pre-processor for packetizing image data of the application*; and
> a display connected to the host, the display displaying an image, wherein said host transfers packetized image data to the display, said display includes a panel control processor for processing the packetized image data and a panel memory for storing processed image data, *wherein the processed image data in the panel memory is displayed as the image, wherein the packetized image data comprises a header identifying the panel control processor and a body including the image data*.

> 29. An image display device comprising:
> a panel for displaying an image;
> an image data receiving means for receiving image data from a host device which executes an application;
> *a plurality of panel control processors, coupled to said image data receiving means*, for processing said image data received from said image data receiving means and displaying a processed image on said panel, *wherein said image data comprises a header identifying a first panel control processor from among the plurality of panel control processors*; and
> a panel memory coupled to said image data receiving means for storing the processed image data.

For at least the foregoing reasons, Applicants submit that the combination of Nicholson and Ludtke fail to disclose or teach every limitation of independent claims 1 and 29. As a result, a *prima facie* case of obviousness has not been established, and the 35 USC §103(a) rejection as to claims 1 and 29 should be withdrawn. Claim 2 depends from independent claim 1 and is thus patentable as well.

Accordingly, the withdrawal of the outstanding prior art rejections is in order, and is therefore, respectfully solicited.

Rejection of claims 30 and 31 under 35 USC § 103(a)

Claims 30-31 depend from claim 29, and are therefore patentable for at least the reasons advanced with respect to independent claim 29. Accordingly, the withdrawal of the outstanding prior art rejections is in order, and is therefore, respectfully solicited.

Rejection of claims 3, 4 and 32 under 35 USC § 103(a)

Since it has been shown that claims 1 and 29 overcome the art rejections, Applicants request withdrawal of the rejection of claims 3, 4 and 32 under 35 U.S.C. 103(a) as they depend from independent claims 1 & 29 respectively.

Accordingly, the withdrawal of the outstanding prior art rejections is in order, and is therefore, respectfully solicited.

Rejection of claim 21 under 35 USC § 103(a)

As indicated above, claim 21 has been cancelled. Accordingly, the withdrawal of the outstanding prior art rejections is in order, and is therefore, respectfully solicited.
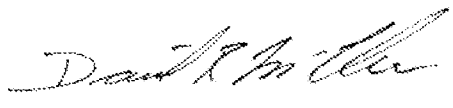
CONCLUSION

In light of the above remarks, all objections and rejections having been addressed, it is therefore respectfully requested that claims 1-4 and 29-32 be allowed

so that the entire case may be passed to early issuance. If there are any remaining issues to be resolved, Applicants request that Examiner contacts the undersigned attorney for a telephone interview.

A petition and credit card authorization is provided herewith to cover the extension fee. No additional fee is believed to be due in connection with this submission. If, however, any fee is believed to be due, you are hereby authorized to charge any such fee to deposit account No. 20-0778.

Respectfully submitted,

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